***Ex Parte* Communication**

February 7, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Spectrum and Service Rules for Ancillary Terrestrial Components in the 1.6/2.4 GHz Big LEO Bands*, IB Docket No. 07-253

Dear Ms. Dortch:

Intel Corporation ("Intel") would like to submit the following *ex parte* letter in the above captioned proceeding.

With minor exceptions, WiMAX systems planned for implementation in the 2.5 GHz BRS band are expected to operate in single frequency TDD mode. The BRS WiMAX systems would therefore be vulnerable to interference from ATC base stations. To avoid harmful interference to WiMAX operations in the 2.5 GHz band, the Commission should apply the same out-of-band emissions limits to MSS ATC licensees as apply to BRS licensees.

Unlike MSS ATC emissions limits, the BRS emission limits become considerably more demanding whenever the interferer's signals approach the channel edge of an adjacent-channel licensee. Adjacent BRS licensees must attenuate their out-of-band emissions by at least 43 + 10 log P dB at their channel edge and by at least 67 +10 log P dB at three megahertz from their channel edge upon receipt of a complaint.[1] Even greater attenuation is required if the complaining station is located less than 1.5 kilometers away.

By comparison, MSS ATC licensees must only meet a flat emissions limit that is substantially more permissive than the BRS limit three megahertz from the MSS ATC band edge.[2] In addition, Globalstar has simultaneously sought to reduce the available, three megahertz frequency separation between MSS ATC and BRS to one megahertz or, at most, 1.5 megahertz.

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[1] See 47 C.F.R. § 27.53(m)(2).

[2] See 47 C.F.R. § 25.254(a)(2)

Putting aside the receiver overload concerns that such a reduction may generate, if the available frequency separation between MSS ATC and BRS-1 is reduced, applying the same BRS emissions limits to MSS ATC would fail to protect adjacent-channel BRS-1 licensees.

Specifically, even if Globalstar were willing to follow the same, progressively increasing emissions limit of 43 + 10 log P dB at the MSS ATC channel edge and 67 + 10 log P dB at three megahertz from the MSS ATC channel edge, the 67 + 10 log P dB emissions mask would not apply until 1.5 megahertz or even two megahertz into the operational BRS-1 channel. This result will not protect BRS-1 operations against harmful interference.

Thus, the Commission should, at a minimum, require MSS ATC licensees to satisfy the more stringent three megahertz adjacent channel emissions limit at the BRS-1 band edge that begins at 2496 MHz. Requiring MSS ATC to meet the 67 + 10 log P dB emissions at the 2496 MHz BRS-1 channel edge would require MSS ATC licensees to offer out-of-band emissions protection to BRS-1 licensees comparable to what BRS-EBS licensees offer one another.

Thank you for your consideration.

Respectfully submitted,

/s/ Peter K. Pitsch

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